



State of Utah

Department of
Environmental Quality

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Executive Director

DIVISION OF AIR QUALITY
Richard W. Sprott
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Lieutenant Governor

DAQE-IN0042007-06

September 8, 2006

Patrick Clark
Staker & Parson Companies
Post Office Box 3429
Ogden, Utah 84409

Dear Mr. Clark:

Re: Intent to Approve: Approval Order Modification to Increase Production and to Update Approved Equipment List, Box Elder County – CDS B; ATT; NSPS; TITLE V Minor
Project Code: N0042-007

The attached document is the Intent to Approve (ITA) for the above-referenced project. ITAs are subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Maung Maung. He may be reached at (801) 536-4153.

Sincerely,

Tim Blanchard, Acting Manager
Minor New Source Review Section

TB:MM:kw

cc: Bear River Health Department

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

**INTENT TO APPROVE: Approval Order Modification
to Increase Production and to Update Approved
Equipment List**

**Prepared By: Maung Maung, Engineer
(801) 536-4153
Email: mmaung@utah.gov**

INTENT TO APPROVE NUMBER

DAQE-IN0042007-06

Date: September 8, 2006

Staker & Parson Companies

**Source Contact
Patrick Clark
(801) 409-2415**

**Richard W. Sprott
Executive Secretary
Utah Air Quality Board**

Abstract

Staker & Parson Companies has proposed to modify its existing approval order DAQE-006-02 for the McGuire Pit in Willard, Utah to increase the production of aggregates from 1,500,000 tons per year to 2,500,000 tons per year. The company also proposes to add new equipment to its approved equipment list and to change the following limitations:

- 1) Condition 10.B be changed to read “20 hours per day of operation by the southern plant (except the hopper, jaw crusher and associated conveyors and stacker);”*
- 2) Condition 15.A. be eliminated as the AP-42 unpaved road dust emission factors no longer include vehicle speed.*
- 3) Condition 15.B be eliminated as the road lengths vary depending on the type of material being hauled from the pit.*

First request to change the language in condition 10.B has been granted. The other two requests can not be granted. The vehicle speed is required to meet the BACT and the road length is required to limit the fugitive dust emissions.

Mcguire pit is in Willard which is located in Box Elder County. Box Elder County is an attainment area of the National Ambient Air Quality Standards (NAAQS) for all pollutants. National Emission Standards for Hazardous Air Pollutants (NESHAP) and Maximum Achievable Control Technology (MACT) regulations do not apply to this source. New Source Performance Standards (NSPS) subpart OOO (Standard of Performance for Nonmetallic Mineral Processing Plants) applies to this source. Therefore, Title V of the 1990 Clean Air Act applies to this source. However, the source is not required to submit an application for a Title V permit since it is a minor source.

The emissions, in tons per year, will change as follows: $PM_{10} = + 10.04$, $NO_x = + 3.30$, $SO_2 = - 0.96$, $CO = + 1.36$, $VOC = + 2.71$.

The changes in emissions will result in the following, in tons per year, potential to emit totals: $PM_{10} = 17.36$, $NO_x = 32.92$, $SO_2 = 3.15$, $CO = 10.11$, $VOC = 4.17$.

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order (AO) by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notice of intent to approve will be published in the Box Elder News & Journal on September 13, 2006. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

General Conditions:

1. This Approval Order (AO) applies to the following company:

Site Office

Staker & Parson Companies
8211 South U.S. Highway 89
Willard, Utah 84340

Corporate Office Location

Staker & Parson Companies
Post Office Box 3429
Ogden., Utah 84409

Phone Number (801) 409-2415

Fax Number (801) 731-8800

The equipment listed in this AO shall be operated at the following location:

8211 South U.S. Highway 89, Willard, 84340

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD83
4,579.610 kilometers Northing, 414.660 kilometers Easting, Zone 12

2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307) and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401.
5. All records referenced in this AO or in applicable NSPS standards which are required to be kept by the owner/operator shall be made available to the Executive Secretary or Executive Secretary's representative upon request. Records shall be kept for the following minimum periods:
 - A. Emission inventories Five years from the due date of each emission statement or until the next inventory is due, whichever is longer.
 - B. All other records Five years
6. Staker & Parson Companies shall conduct its operations of the McGuire Pit in accordance with the terms and conditions of this AO which was written pursuant to the Company's Notice of Intent submitted to the Division of Air Quality (DAQ) on June 12, 2006 and additional information submitted to the DAQ on August 15, 2006.
7. This AO shall replace the AO DAQE-006-02, dated January 8, 2002.

8. The approved installations shall consist of the following equipment or equivalent*:
 - A. One (1) Telsmith jaw crusher* (mfg. 1997) rated at 500 tph (tons per hour) (NP)
 - B. One (1) Cedar Rapids jaw crusher* (mfg. 2005) rated at 500 tph (SP)
 - C. One (1) El-Jay cone crusher* (mfg. 1993) rated at 500 tph (SP)
 - D. One (1) MVP 450 cone crusher* (mfg. 1993) 500 tph (SP)
 - E. One (1) El-Jay 6 x 20 screen* (mfg. 1998) rated at 600 tph (SP)
 - F. One (1) El-Jay 6 x 20 screen* (mfg. 1998) rated at 600 tph (SP)
 - G. One (1) El-Jay 7 x 20 screen* (mfg. 1998) rated at 700 tph (NP)
 - H. One (1) El-Jay 6 x 20 screen* (mfg. 1992) rated at 600 tph (SP)
 - I. One (1) El-Jay 6 x 20 screen* (mfg. 1999) rated at 600 tph (SP)
 - J. One (1) power screen * (mfg 1992) rated at 250 tph (Both plant)
 - K. Associated conveyors and other support equipment

NP stands for North plant and SP stands for South plant

* Equivalency shall be determined by the Executive Secretary.

9. Staker & Parson Companies shall notify the Executive Secretary in writing when the installation of the equipment listed in Condition #8 has been completed and is operational, as an initial compliance inspection is required. To insure proper credit when notifying the Executive Secretary, send your correspondence to the Executive Secretary, attn: Compliance Section.

If the construction and/or installation has not been completed within eighteen months from the date of this AO, the Executive Secretary shall be notified in writing on the status of the installation. At that time, the Executive Secretary shall require documentation of the continuous installation of the operation and may revoke the AO in accordance with R307-401-18.

10. Visible emissions from the following emission points shall not exceed the following values:
 - A. All crushers - 15% opacity
 - B. All screens - 10% opacity
 - C. All conveyor transfer points - 10% opacity
 - D. All diesel engines - 20% opacity

- E. Conveyor drop points - 20% opacity
- F. All storage piles – 10%
- G. All other points - 20% opacity

Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.

For sources that are subject to NSPS, opacity shall be determined by conducting observations in accordance with 40 CFR 60.11(b) and 40 CFR 60, Appendix A, Method 9.

11. The following production/consumption and hourly limits shall not be exceeded:
 - A. 2,500,000 tons of material produced per rolling 12-month period
 - B. 200,000 gallons of diesel fuel per rolling 12-month period
 - C. 20 hours of south plant operation per day during any hour of the day, except for the hopper, jaw crusher and its associated conveyors and stacker, which can operate 24 hours per day
 - D. 24 hours of north plant operation per day during any hour of the day

To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. Records of production/consumption and hours of operation shall be kept for all periods when the plant is in operation. The records of production/consumption and operating hours shall be kept on a daily basis. Production shall be determined by sales records of final product shipped. Hours of operation shall be determined by supervisor monitoring and maintaining of an operations log. Diesel fuel consumption shall be determined by fuel purchase records.

Roads and Fugitive Dust

12. All unpaved roads and other unpaved operational areas that are used by mobile equipment shall be water sprayed and/or chemically treated to control fugitive dust. The application of water or chemical treatment shall be used. Treatment shall be of sufficient frequency and quantity to maintain the surface material in a damp/moist condition unless it is below freezing. The opacity shall not exceed 20% during all times the areas are in use. If chemical treatment is to be used, the plan must be approved by the Executive Secretary. Records of water and/or chemical treatment shall be kept for all periods when the plant is in operation. The records shall include the following items:
 - A. Date
 - B. Number of treatments made, dilution ratio, and quantity
 - C. Rainfall received, if any, and approximate amount
 - D. Time of day treatments were made
 - E. Records of temperature if the temperature is below freezing

13. Visible emissions from haul-road traffic and mobile equipment in operational areas shall not exceed 20% opacity. Visible emissions determinations for traffic sources shall use procedures similar to Method 9. The requirement for observations to be made at 15-second intervals over a six-minute period shall not apply. Six points, distributed along the length of the haul road or in the operational area, shall be chosen by the Executive Secretary or Executive Secretary's representative. An opacity reading shall be made at each point when a vehicle passes the selected points. Opacity readings shall be made one half the vehicle length or greater behind the vehicle and at approximately one half the height of the vehicle or greater. The accumulated six readings shall be averaged for the compliance value.
14. Water sprays or chemical dust suppression sprays shall be installed at the following points to control fugitive emissions:
 - A. All crushers
 - B. All screens
 - C. All unenclosed conveyor transfer points *

* - enclosed defined as having three (3) or more sides

The sprays shall operate when necessary, to ensure that the opacity limitations of this AO are not exceeded.

15. The storage piles shall be watered to minimize generation of fugitive dusts as dry conditions warrant or as determined necessary by the Executive Secretary.
16. The speed of mobile equipment (trucks, front end loaders, etc.) shall not exceed:
 - A. 15 miles per hour
 - B. 0.4 miles in length

The haul road speed shall be posted, at a minimum, on site at the beginning of the haul road so that it is clearly visible from the haul road.

17. Staker & Parson Companies shall abide by all applicable requirements of R307-205 for Fugitive Emission and Fugitive Dust sources.

Fuels

18. The owner/operator shall use only #2 fuel oil as fuel.
19. The sulfur content of diesel fuel burned shall not exceed:
 - A. 0.05 percent by weight for diesel fuels consumed in all equipment.

The sulfur content shall be determined by ASTM Method D-4294-89 or approved equivalent. Certification of sulfur content in fuel shall be either by Parson's own testing or test reports from the fuel supplier.

Federal Limitations and Requirements

20. In addition to the requirements of this AO, all applicable provisions of 40 CFR 60, New Source Performance Standards (NSPS) Subpart A, 40 CFR 60.1 to 60.18 and Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants) apply to this installation.

Records & Miscellaneous

21. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this Approval Order, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on the information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on the equipment authorized by this AO shall be recorded.
22. The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring.
23. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the Division of Air Quality. The Utah Administrative Code R307 rules used by DAQ, the Notice of Intent (NOI) guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emissions estimations below include point source, fugitive emissions, fugitive dust, road dust, etc. and do not include tail pipe emissions, grandfathered emissions, etc. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, Maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for this source (the entire plant) are currently calculated at the following values:

<u>Pollutant</u>	<u>Tons/yr</u>
A. PM ₁₀	17.36
B. SO ₂	3.15

C. NO _x	32.92
D. CO	10.11
E. VOC	4.17

The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final Approval Order.

Sincerely,

Tim Blanchard, Acting Manager
Minor New Source Review Section